

# CUTI HECKER WANG LLP

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July 21, 2022

**By ECF**

Honorable Denise L. Cote  
United States District Judge  
United States District Court for the  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Bronx Public Administrator Matilde B. Sanchez, on behalf of the estate of Alyssa Rodriguez v. City of New York, et al.*, 18 Civ. 7538 (DLC)

Dear Judge Cote:

This firm represents Bronx Public Administrator Matilde B. Sanchez in connection with the claims of decedent Alyssa Rodriguez in the above-referenced matter. We write on behalf of all parties to seek an extension of the deadline for mediation and an adjournment of the conference scheduled for July 29, 2022.

At the request of the parties, by Order dated April 19, 2022, the Court referred this case for mediation with Rebecca Price of the SDNY Mediation Program. The Court initially ordered that the mediation take place by the end of June. It subsequently granted an extension of that date, to the end of July, by Order dated May 25, 2022. In connection with that Order, the parties currently have a mediation scheduled for July 29, 2022, the same day as the conference scheduled with Your Honor.

Since the Court's Order of May 25, the parties have exchanged the additional discovery needed to facilitate the mediation. Counsel have also engaged in significant discussions about settlement with each other, their clients, and the mediator. Plaintiff presented to defense counsel a settlement demand and detailed letter explaining the basis for her claims. The amount in controversy in this matter is substantial, and the parties have worked diligently and in good faith to advance the settlement process and prepare for the mediation. At this time, however, the parties need a further extension, to ensure that the Comptroller has sufficient time to grant settlement authority in advance of the mediation.

Counsel have conferred with Ms. Price, and agreed to reschedule the mediation for August 17, 2022, subject to approval by this Court and its agreement to extend the current deadlines. The parties and Ms. Price believe this extra time will make the mediation more likely to succeed. Because the Court had intended to hold a scheduling conference after the mediation, we respectfully request an adjournment of the conference scheduled for July 29, 2022. There has been one prior adjournment of the conference.

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Accordingly, we respectfully request that the Court (a) extend the deadline for mediation by one month, to the end of August; and (b) adjourn the conference scheduled for July 29, 2022. Please be advised that I will be out of the country the weeks of August 22 and August 29, and therefore respectfully request that the conference be scheduled for early September, to allow the parties to confer about the discovery schedule as needed after the mediation.

We thank Your Honor for your consideration of this letter.

Respectfully Submitted,



Alexander Goldenberg

Granted. The July 29  
conference is adjourned  
until September 1, 2022 at  
2:00 p.m.

7/22/2022



DENISE COTE

United States District Judge